REMARKS

Please reconsider this application in view of the following remarks. The Applicant thanks the Examiner for carefully considering this application and for withdrawing the previous rejection.

Disposition of the Claims

Claims 1-17 are pending in the present application. Claims 1, 7, and 12 are independent. The remaining claims depend, directly or indirectly, from claims 1, 7, and 12.

Rejections under 35 U.S.C. § 103

Claims 1, 3, 7-12 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,380,959 (hereinafter "Wang") in view of U.S. Patent Publication No. 2003/0084120 (hereinafter "Egli"). This rejection is respectfully traversed.

Turning to the rejection of the claims, to establish a *prima facie* case of obviousness, "[f]irst, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations" (*see* MPEP § 2143). Further, "all words in a claim must be considered in judging the patentability of that claim against the prior art" (*see* MPEP § 2143.03). Applicant

respectfully asserts that the references, when combined, fail to teach or suggest all the limitations of claims 1, 3, 7-12 and 14.

Claims 1, 3, 12 and 14

Independent claims 1 and 12 relate to a method for providing extensible client calendar functions using a distributed computer network. Specifically, independent claims 1 and 12 recite, in part, "receiving a request for calendar functions from a client" and "accessing a Java server page corresponding to the request." While the Applicant recognizes that the Examiner is required to give the claims their broadest reasonable interpretation, the Applicant respectfully submits that the Examiner has read out the plain meaning of the term "Java server page." In particular, the Examiner has attempted to equate the Java applets described by Wang with a Java server page (_see_ Office Action dated June 14, 2006, page 3). However, the applets described by Wang are Java programs that are _downloaded_ to a client's web browser and then processed _client-side_ (_see_ Wang, col. 3, lines 37-46). To the contrary, as previously submitted, a Java server page (JSP) is a _server-side_ technology for displaying dynamic content in a web page. Specifically, a typical JSP includes both HTML and Java source code, where the HTML and _results of processing_ the Java source code are combined to provide the dynamic content (_see, e.g._, page 15, lines 15-25 of the instant specification and http://java.sun.com/products/jsp/ for detailed discussions of JSP technology). Clearly, _client-side_ processing of a Java applet is not at all equivalent to _server-side_ processing of a Java server page. Thus, in equating the Java applet of Wang with a Java server page, the Examiner has read out the plain meaning of the term "Java server page," which is wholly improper.

Further, even when ignoring the plain meaning of the term "Java server page," independent claims 1 and 12 recite, in part, "transmitting the processed Java server page,

including information responsive to the request for calendar functions, to the client *after creating the collection and processing the Java server page*." Thus, independent claims 1 and 12 clearly require that the Java server page be processed *prior* to transmitting the processed Java server page to the client. To the contrary, as described above, the Java applet of Wang is processed *client-side, i.e., after* transmitting the Java applet to the client. Thus, the Java applet of Wang is clearly not *at all* equivalent to the Java server page recited in the claims. In fact, a thorough review of Wang reveals that Wang is completely silent with respect to *any* sort of Java server page *whatsoever*. Thus, in equating the Java applet of Wang with the Java server page recited in the claims, the Examiner has read out an express limitation of the claims, which is wholly improper.

Moreover, even assuming *arguendo* that a Java applet is equivalent to a Java server page, the Examiner has admitted that Wang does not disclose "accessing a plurality of tags contained within the Java server page" and "processing the Java server page using the plurality of tags to access a calendar server for providing the calendar functions," as required by independent claims 1 and 12. Instead, the Examiner has relied on Egli to supply that which Wang lacks (*see* Office Action dated June 14, 2006, page 3). While Egli admittedly discloses a Java server page (JSP) that includes a plurality of tags, the Examiner has not provided *any* indication *whatsoever* of where the tags are used *to access a calendar server for providing the calendar functions*. In fact, a thorough review of Egli reveals that Egli is completely silent with respect to *any* sort of calendar, calendar server, or calendar function *whatsoever*. Thus, in taking the above approach, the Examiner has read out an express limitation of the claims, which is wholly improper.

In addition, the Applicant respectfully submits that there would have been absolutely *no* motivation for one of ordinary skill in the art to combine the teachings of Wang with the teachings of Egli. As described above, a Java server page (JSP) is a *server-side* technology for displaying dynamic content in a web page. In particular, in Egli, a JSP is used to dynamically generate an *HTTP response* that is transmitted to a web browser (*see* Egli, paragraphs [0036] and [0085]). Thus, the web browser in Egli only requires standard HTTP response handling capability to access the results of processing the JSP. In contrast, because the Java applets of Wang are always processed *client-side*, Wang requires that the web browser *always* include client-side Java processing capability. In fact, Wang expressly *teaches away* from the use of any web browsers that do not support client-side Java processing, because "this kind of browser would not get the results produced by the applets" (*see* Wang, col. 3, lines 42-46). Said another way, Wang effectively *teaches away* from the web browser compatibility provided by Egli. Accordingly, there would have been absolutely *no* motivation for one of ordinary skill in the art to combine the teachings of Wang with the teachings of Egli.

Further, the Applicant respectfully submits that there would not be any reasonable expectation of success when attempting to combine the teachings of Wang with the teachings of Egli. As described above, in Wang, a web browser *downloads* a Java applet and processes the Java source code *client-side*. In contrast, in Egli, Java source code is processed *server-side* and the results of the processing are provided to the web browser in the form of an *HTTP response*. Said another way, in Egli, *no* Java source code *whatsoever* is transmitted to the web browser for processing. Clearly, a web browser cannot simultaneously *download* Java source code and *not download* Java source code. Accordingly, there would not be any

reasonable expectation of success when attempting to combine the teachings of Wang with the teachings of Egli.

In view of the above, Wang and Egli, whether taken separately or in combination, clearly do not teach or suggest all the limitations of independent claims 1 and 12. Thus, independent claims 1 and 12 are patentable over Wang and Egli for at least the reasons given above. Claims 3 and 14 depend, directly or indirectly, from independent claims 1 and 12, and are therefore patentable over Wang and Egli for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 7-11

Independent claim 7 relates to a method for generating an extended Java server page for providing extensible client calendar functions. Specifically, independent claim 7 recites, in part, "invoking a Java server page using a page editor application to generate a new Java server page." The Examiner has attempted to equate the Java applets described by Wang with a Java server page (*see* Office Action dated June 14, 2006, page 4). However, as described above with respect to independent claims 1 and 12, the Java applet of Wang is not *at all* equivalent to a Java server page. In fact, as described above, Wang is completely silent with respect to *any* sort of Java server page *whatsoever*. Thus, in attempting to equate the Java applet of Wang with a Java server page, the Examiner has read out the plain meaning of the term "Java server page," which is wholly improper.

Further, as previously submitted, the concept of a page editor application is well known in the art as an application used by a web page author to generate a new web page (*e.g.,* HTML, Java server pages, or any other type of static or dynamic web page) prior to publishing

the web page for client access. Thus, independent claim 7 clearly requires an application used to *generate* a Java server page, *prior* to any accessing of the Java server page by a client. The Applicant respectfully submits that the Examiner has not provided *any* indication *whatsoever* of where Wang discloses a page editor application used to generate a new Java server page. In fact, a thorough review of Wang reveals that Wang is completely silent with respect to *any* sort of page editor application *whatsoever*. Thus, in relying on Wang to describe "invoking a Java server page *using a page editor application* to generate a new Java server page," the Examiner has read out an express limitation of the claim, which is wholly improper.

Moreover, even assuming *arguendo* that Wang discloses "invoking a Java server page using a page editor application to generate a new Java server page," the Examiner has admitted that Wang does not disclose "wherein the command tag, the collection tag, and the bean tags are configured to provide access to the calendar functions of a calendar server." Instead, the Examiner has relied on Egli to supply that which Wang lacks (*see* Office Action dated June 14, 2006, page 5). However, as described above with respect to independent claims 1 and 12, Egli is completely silent with respect to *any* sort of calendar, calendar server, or calendar function *whatsoever*. Accordingly, Egli cannot possibly disclose "wherein the command tag, the collection tag, and the bean tags are configured *to provide access to the calendar functions of a calendar server*." Thus, in taking the above approach, the Examiner has read out an express limitation of the claim, which is wholly improper.

In addition, as described above with respect to independent claims 1 and 12, the Applicant respectfully submits that there would have been absolutely *no* motivation for one of ordinary skill in the art to combine the teachings of Wang with the teachings of Egli. Further, as

described above, there would not be any reasonable expectation of success when attempting to combine the teachings of Wang with the teachings of Egli.

In view of the above, Wang and Egli, whether taken separately or in combination, clearly do not teach or suggest all the limitations of independent claim 7. Thus, independent claim 7 is patentable over Wang and Egli for at least the reasons given above. Claims 8-11 depend, directly or indirectly, from independent claim 7, and are therefore patentable over Wang and Egli for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 2 and 13

Claims 2 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang, in view of Egli and further in view of U.S. Patent No. 6,208,336 (hereinafter "Carter"). This rejection is respectfully traversed.

As described above, Wang and Egli fail to disclose all the limitations of independent claims 1 and 12. Further, Carter fails to supply that which Wang and Egli lack, as evidenced by the fact that the Examiner has relied on Carter solely to disclose "wherein accessing the Java server page corresponding to the request comprises retrieving the Java server page from a set of compiled Java server page classes" (*see* Office Action dated June 14, 2006, pages 6-7).

In view of the above, Wang, Egli, and Carter, whether taken separately or in combination, clearly do not teach or suggest all the limitations of independent claims 1 and 12. Thus, independent claims 1 and 12 are patentable over Wang, Egli, and Carter for at least the reasons given above. Claims 2 and 13 depend, directly or indirectly, from independent claims 1

and 12, and are therefore patentable over Wang, Egli, and Carter for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 4 and 15

Claims 4 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang, in view of Egli and further in view of U.S. Patent No. 6,453,281 (hereinafter "Walters"). This rejection is respectfully traversed.

As described above, Wang and Egli fail to disclose all the limitations of independent claims 1 and 12. Further, Walters fails to supply that which Wang and Egli lack, as evidenced by the fact that the Examiner has relied on Walters solely to disclose "providing extended calendar functions by accessing a plurality of extended tags contained within the Java server page, wherein the calendar functions are extended by adding the plurality of extended tags corresponding to new calendar service functionality of the calendar server" (*see* Office Action dated June 14, 2006, page 7).

In view of the above, Wang, Egli, and Walters, whether taken separately or in combination, clearly do not teach or suggest all the limitations of independent claims 1 and 12. Thus, independent claims 1 and 12 are patentable over Wang, Egli, and Walters for at least the reasons given above. Claims 4 and 15 depend, directly or indirectly, from independent claims 1 and 12, and are therefore patentable over Wang, Egli, and Walters for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 5-6 and 16-17

Claims 5-6 and 16-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang, in view of Egli and further in view of U.S. Patent Publication No. 2002/0038316 (hereinafter "Onyon"). This rejection is respectfully traversed.

As described above, Wang and Egli fail to disclose all the limitations of independent claims 1 and 12. Further, Onyon fails to supply that which Wang and Egli lack, as evidenced by the fact that the Examiner has relied on Onyon solely to disclose "wherein transmitting the processed Java server page to the client is in accordance with WAP (wireless application protocol) communication standards" and "wherein transmitting the processed Java server page to the client is in accordance with WML (wireless markup language) communication standards" (*see* Office Action dated June 14, 2006, page 8).
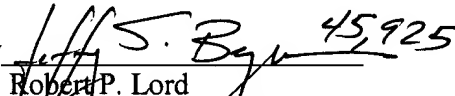
In view of the above, Wang, Egli, and Onyon, whether taken separately or in combination, clearly do not teach or suggest all the limitations of independent claims 1 and 12. Thus, independent claims 1 and 12 are patentable over Wang, Egli, and Onyon for at least the reasons given above. Claims 5-6 and 16-17 depend, directly or indirectly, from independent claims 1 and 12, and are therefore patentable over Wang, Egli, and Onyon for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

The Applicant believes this reply is fully responsive to all outstanding issues and

places this application in condition for allowance. If this belief is incorrect, or other issues arise,

the Examiner is encouraged to contact the undersigned or his associates at the telephone number

listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591

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Dated: September 14, 2006   Respectfully submitted,

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